## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SHANIECE MATTHEWS, as guardian <i>ad</i> , <i>litem</i> and on behalf of her son D.W.,	)	
Plaintiff,	)	
	)	No. 18 CV 6675
V.	)	Judge Joan B. Gottschall
	)	
The State of Illinois et al.,	)	
	)	
Defendants.	)	

## PLAINTIFF'S RENEWED MOTION TO CERTIFY CLASS UNDER RULE 23(b)(2)

Plaintiff Shanice Mathews, on behalf of her son D.W. and other children similarly situated, respectfully moves that for both counts I and II, this Court certify the proposed class described in paragraph 20 of the Third Amended Complaint under Fed. R. Civ. P. 23(b)(2). In support of this motion, Plaintiff Mathews states:

- 1. Plaintiff Demetria Powell previously filed a motion and memorandum of law to certify the same proposed class under Fed. R. Civ. P. 23(b)(2) (DK. 57 and 57-1).
- 2. Plaintiff Powell, who was then the sole plaintiff, has withdrawn from the case because she and her son have moved out of Chicago. The Complaint has been subsequently amended.
- 3. Accordingly, for the Third Amended Complaint, filed on May 20, 2022 (DK. 139), Plaintiff Mathews has filed this renewed motion to certify the class as described in paragraph 20.
  - 4. Defendants have not consented to this motion.

In support of such certification under Fed. R. Civ. P. 23(b)(2), Plaintiff Mathews has filed the accompanying Memorandum of Law in Support of Class Certification.

Respectfully submitted,

Dated: June 9, 2022

By: /s/ Thomas H. Geoghegan
One of Plaintiff's Attorneys

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